



177567
U.S.G.

Refer to: L1190400007 -- Madison
Taracorp/NL Industries
Superfund/Technical Reports

November 4, 1991

Dear Mr. Bradley:

Listed below are the "points of concern" that IEPA maintains after the conference call October 10, 1991 with you, the Corp and the contractor for the site. The conversation was in regards to the comments generated from IEPA and USEPA's review of the Draft Chemical Data Acquisition Plan (with Appendices) and the Draft Health and Safety Plan (dated August 1991; received August 23, 1991).

1. The placement of bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids (whether or not absorbents have been added) in any landfill, is prohibited under Section 724.414b or 35 IAC, Subtitle G. To demonstrate the absence or presence of free liquids in either a containerized or a bulk waste, the following test must be used: Method 9095 (Paint Filter Tests) from USEPA's SW-846 third edition, as per Section 724.414c. The placement of any liquid which is not a hazardous waste in a landfill is prohibited (35 Ill. Adm. Code 729.311) as defined in 724.414E.

Only material that has been dewatered or passes the paint filter test can be added to the pile. Rinsate collected from various locations therefore shouldn't be dumped onto said pile. The use of containers or a tank to contain the rinsate on-site would be a viable option. Treatment may be required for the liquids. One option would be to allow the open tanks to evaporate water while leaving the contaminants in place for proper disposal.

2. The use of stainless steel materials in well development associated with the landfill is required for all new installations since volatile organics are to be analyzed in samples from the uppermost aquifer. Section 724.194(a)(1) states that the concentration of a hazardous constituent must not exceed the background level of that constituent in the groundwater, installing PVC wells may alter the data.
3. IEPA maintains that weekly blood levels be required for contractual workers, in high areas of contamination. The Army Corp of Engineers (ACOE) is relying on the 29 CFR 1910.1025 guideline, however, this standard isn't applicable since it applies to industrial conditions where ambient air conditions and ventilation levels would be constant. I have enclosed a copy of Jim O'Brien's letter written by J. Niemann, IEPA's (Industrial Hygienist) on this issue.



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If you have any questions or further comments on these issues, please contact me at 217/782-6761.

Sincerely,

A handwritten signature in cursive script, appearing to read "T.E. Fitzgerald".

T.E. Fitzgerald
Federal Sites Management Unit
Remedial Project Management Section
Division of Land Pollution Control

TEF:1at/3293q,29-30

cc: Terry Ayers
Kurt Neibergall
Virginia Wood
Connie Sullinger
Jeff Nieman
Division File



DATE: October 21, 1991

TO: Tracey Fitzgerald

FROM: James O'Brien *[Signature]* By: J. Niemann *[Signature]*

SUBJECT: Taracorp/NL Industries
Biological Monitoring - Blood Leads

HSU continues to contest that blood lead levels should be checked on a weekly basis when the contractor moves into those areas which have been identified as having high lead concentrations in soil. This decision is based on "good industrial hygiene practice" rather than on the specifics of OSHA 29 CFR 1910.1025. Further, the Agency's experience at Dutch Boy Paints in Chicago has substantiated the importance of weekly monitoring in order to prevent lead exposure to site workers.

The Army Corp. of Engineers has stated that OSHA 29 CFR 1910.1025 requires only monthly blood monitoring for lead exposure. However, this standard is not applicable to the Taracorp site since the job tasks apply to construction activities. The OSHA "1910" standards apply only to industrial conditions where ambient air concentrations and ventilation levels would be constant.

The Army Corp. of Engineers has stated that monthly blood monitoring is sufficient to identify any potential exposures before actual toxic effects could occur. At the Dutch Boy Paints site the improper use of respiratory protection for a previously non-identified job task caused an extremely high exposure which then necessitated having the personnel removed from the site immediately. TAU has also noted that an exposure which would occur in the beginning of the month would be absorbed into the bone and therefore not be available for discovery in the blood analysis taken at the end of the month.

The Army Corp. of Engineers has stated that a "dust storm" would have to occur before the workers would be exposed to any harmful levels of lead in the soil. Besides not providing any calculations to support this conclusion, lead absorption can also take place through the digestive tract resulting from poor decontamination procedures. Hand-to-mouth motions are very difficult to regulate and are usually done unconsciously by the worker. (In the aluminum industry worker overexposure to fluorides from handling cigarettes with unwashed hands has been documented.)

Our conclusion is that the blood lead levels of contractual workers should be checked weekly.

If you should have any further questions, you may contact the HSU at 5-0830.

JO'B/JKN/psf

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OCT 28 1991
IEPA/DLPC